Daniel S. Szalkiewicz, Esq. (DS2323) DANIEL SZALKIEWICZ & ASSOCIATES, P.C. 23 WEST 73RD STREET SUITE 102 NEW YORK, NEW YORK 10023 Attorneys for Plaintiff John Doe

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

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Plaintiff,

Case No. 2:21-cv-20706

v.

Baila Sebrow

Defendant

NOTICE OF MOTION TO STRIKE DEFENDANT BAILA SEBROW'S ANSWERS

PLEASE TAKE NOTICE that on February 6, 2023, at 10:00 a.m., or such other time as fixed by the Court, the undersigned attorney for the plaintiff, JOHN DOE, will move before the United States District Court of the District of New Jersey, to strike defendant Baila Sebrow's answer for failure to comply with Rule 26.1 and this Court's orders, to enter a default judgment against defendant, and to set this matter down for an inquest.

In support of this motion, the Plaintiff will submit the Declaration of Daniel S.

Szalkiewicz, Esq and Brief in Support. A proposed Order is also submitted herewith pursuant to Local Rule 7.1(e).

Dated: December 27, 2022 New York, New York

Respectfully submitted,

/s/Daniel Szalkiewicz

By: Daniel S. Szalkiewicz, Esq. (DS2323)